BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

| REO | 9 72 |
|-----------|---------|
| REGULYT | Wyman |
| 99 NOV 16 | PM 3 26 |

| IN RE: |) | EXECUTIVE SECLETARY |
|---|----------------|---------------------|
| PETITION OF BEN LOMAND COMMUNICATIONS INC. FOR APPROVAL OF AN INTRALATA TOLL DIALING PARITY IMPLEMENTATION PLAN |) S,)) | Docket No. 99-00258 |

REVISED RESUBMITTED PLAN

Ben Lomand Communications, Inc. (BLC) does pursuant to order of the Tennessee Regulatory Authority granting BLC's motion to delay implementation of IntraLATA Toll Dialing Parity Implementation Plan which was unanimously approved at the Authority's June 22, 1999, conference, hereby file as Exhibit 2 to its original petition, which was filed April 16, 1999, a revised resubmitted IntraLATA Toll Dialing Parity Implementation Plan to be considered by the Authority in lieu of the original plan filed as Exhibit 1 on April 16, 1999.

Ben Lomand Communications, Inc. as of the date of the filing of this revised resubmitted plan has lines in place in a portion of McMinnville, Tennessee, and due to the very favorable weather and good working conditions over the past 45 days, there is a possibility of service being offered on a limited scale within the 60-day period following the filing of this request.

PREMISES CONSIDERED, PETITIONER PRAYS:

1. That the Tennessee Regulatory Authority accept this revised resubmitted petition, and upon hearing or its own motion, consider and approve the IntraLATA Toll Dialing Parity Implementation Plan set out as Exhibit 2 to the original petition which is attached to this request.



2. That the Authority grant the Petitioner, Ben Lomand Communications, Inc., such other, further, and general relief as the Authority might consider it entitled to under the premises.

DATED: This 10th day of November, 1999.

Respectfully submitted,

BEN LOMAND COMMUNICATIONS, INC.

James W. Dempster, Attorney
P.O. Box 332
McMinster

McMinnville, TN 37111 Phone No.: (931) 473-4934 FAX No.: (931) 473-7190



BEN LOMAND COMMUNICATIONS, INC.

Revised - Resubmitted

IntraLATA Toll Dialing Parity Implementation Plan

June 1, 1999

Implementation Date



BEN LOMAND COMMUNICATIONS, INC.

McMinnville, Tennessee

November 10, 1999

Exhibit 2 to the Petition of BEN LOMAND COMMUNICATIONS, INC. to the Tennessee Regulatory Authority for Approval of the subject plan.



I. Purpose

Ben Lomand Communications, Inc. (BLC) has described herein the process for implementing intraLATA toll dialing parity in the BLC exchanges located in the state of Tennessee. The intent of this Plan is to provide a proposal that, upon implementation, would provide customers the ability to select the telecommunications carrier of their choice for routing their intraLATA toll calls.

II. IntraLATA Environment

BLC expects to provide service to customers within the next thirty (30) days. At the time customers receive service, they will be able to subscribe to the carrier of their choice for intraLATA as well as interLATA service (two-PIC subscription capability.) Customers will dial 1+ the area code and number to complete calls using their subscribed carrier. If customers wish to complete a call using a carrier other than their subscribed carrier, they will need to dial the carrier's access code.

Each end office switch will be equipped with the capability of allowing each end user subscriber to select "no-PIC" as a valid intraLATA subscription selection. Customers selecting "no-PIC" as their subscribed carrier will not be able to make intraLATA toll calls on a 1+ or 0+ dialed basis. Such customer will need to dial an access code each time he or she makes an intraLATA call.

In 1992, toll-free intraLATA county-wide calling was initiated for all Local Exchange Carrier's via an order from the Tennessee Public Service Commission. BellSouth currently maintains tax-code billing tables to identify "free-county-wide" intraLATA toll calls originated by BLC intraLATA toll customers and to ensure that billing does not occur on these calls. BLC will continue to process toll-free intraLATA county-wide calls in this manner for toll customers after implementation of intraLATA toll dialing as long as technically feasible.

III. Implementation Schedule

BLC will provide intraLATA toll dialing parity in Tennessee at the time customer service is available.

IV. Carrier Selection Procedures

BLC will implement the full Two-PIC (Primary Interexchange Carrier) carrier selection methodology. With the full two-PIC methodology, customers will be able to subscribe to one telecommunications carrier for interLATA toll calls and subscribe to the same or a different participating telecommunications carrier, for all intraLATA toll calls.



BLC employees who communicate with the public, accept customer orders, and serve in customer service capacities will be trained to explain to customers the process for making PIC changes for intraLATA toll calls. Business Office personnel and the Customer Account Records system will be prepared to make changes in customer records based upon requests from customers or carriers and direct customers to their chosen intraLATA carriers. Processes will be in place to provide customers with an opportunity to choose their intraLATA toll carrier from a list of available carriers.

New Installation Customers

BLC customer contact representatives will be provided discussion guidelines that will provide a new customer with the following information:

- 1. Inform the customer that a choice of intraLATA toll providers is now available to him or her.
- 2. Offer to read the customer a list of available carriers in randomly generated order.
- 3. Advise the customer that various carriers provide intraLATA toll service.

Customers who do not make a positive choice for an intraLATA toll carrier will be notified that they will not be automatically defaulted to a carrier and will be required to dial an access code to place intraLATA toll calls until they make an affirmative choice for an intraLATA toll carrier.

V. Carrier Notification

Interexchange carriers will be notified of BLC intraLATA toll dialing parity implementation via Certified U. S. Mail at the same time they are notified of the in service date of the C-LEC operation . Certified carriers who enter the market after implementation will be added to the list of participating carriers within 30 days of notifying BLC.

BLC will offer BLC Listed Name and Address and BLC Change Activity Register services for the purpose of assisting the carrier's marketing efforts in connection with marketing their telecommunications services. BLC Listed Name and Address service provides a list of customers available for subscription within BLC central offices. The data base is updated monthly.



VI. Operator Services and Directory Assistance

Access to Operator Services and Directory Assistance will continue to be available through the customer's local exchange carrier or interLATA carrier. No industry standard exist for access to Operator Services and Directory Assistance unique to intraLATA services. For Operator Services, customers dial "0" to reach their local exchange operator and "00" to reach their interLATA operator. For Directory Assistance, customers dial "1-411" for accessing the local exchange Directory Assistance and dial "1-NPA-555-1212" for accessing their interLATA carrier's Directory Assistance.

VII. Cost Recovery

BLC does not request any cost recovery since intralata dialing parity will be implemented with the offering of service.

VIII. Statement of Compliance

BLC will comply with all rules of the FCC and the TRA.

Executed as of the 10th Day of November, 1999

Judy Kelsey U Operations Manager